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November 22, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007
(212) 805-0288

Mark A. Kirsch
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Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC*, No. 20 Civ. 3773 (LGS) (S.D.N.Y.)

Dear Judge Schofield:

We write jointly as counsel for all parties in the above-referenced action. Pursuant to Paragraph I.B.2 of Your Honor's Individual Rules and Procedures (the "Individual Rules"), we respectfully request an extension of the parties' December 14, 2022 deadline to submit the following materials to be included in the proposed joint final pretrial order: trial witness lists; deposition designations, counter-designations, and objections; and exhibit/demonstrative aid lists and objections. *See* Dkt. No. 225; Indiv. Rules ¶ IV.B.2(f)-(i). This is the second request for an extension of the deadline for the proposed joint final pretrial order. *See* Dkt. No. 223. The Court granted in part Defendants' prior extension request. *See* Dkt. No. 225.

Both sides are diligently preparing for trial and are working cooperatively to fulfill the requirements of the proposed joint final pretrial order. The parties need additional time to prepare the witness list, deposition designation, and exhibit related materials to be included in the proposed joint final pretrial order pursuant to Paragraph IV.B.2(f)-(i) of the Individual Rules. The parties respectfully request that they be permitted to submit a proposed joint final pretrial order by the existing deadline that includes all other information specified in Paragraph IV.B.2 of the Individual Rules, and submit the materials specified in Paragraph IV.B.2(f)-(i) pursuant to the following schedule:

Witness Lists, Designations, Counter-Designations, and Objections

Dec. 12, 2022: Parties exchange trial witness lists

Dec. 21, 2022: Parties exchange deposition designations

Dec. 30, 2022: Parties file deposition designations, counter-designations, and objections

Lists of Exhibits and Demonstrative Aids, and Objections

Dec. 7, 2022: Parties exchange initial lists of exhibits and demonstrative aids

Dec. 23, 2022: Parties exchange final lists of exhibits and demonstrative aids

Dec. 30, 2022: Parties file final lists of exhibits and demonstrative aids, and objections

We thank the Court for its consideration of this request.

Respectfully,

CLEARY GOTTlieb STEEN
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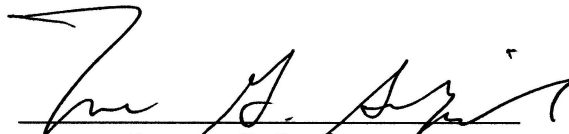
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Counsel for Defendants

Application GRANTED. The parties shall exchange materials by the dates listed above and shall file their exhibit lists, demonstrative aids and deposition designations by **December 30, 2022**.

The parties shall meet and confer in advance of filing those materials in an effort to resolve any disputes over admissibility, because the Court intends to pre-admit exhibits at the final pretrial conference, and the conference will continue as long as necessary to do so. If the parties continue to dispute the admissibility of any exhibits, the parties shall also file a joint letter by **December 30, 2022**, grouping the exhibits by category and stating each party's position on each category with supporting authority.

Dated: November 29, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE